REMARKS

This communication is in response to the Final Office Action of March 29, 2007.

Claims 34-60 were previously pending in this application. Applicant has cancelled Claims 34-60 without prejudice or disclaimer of the subject matter therein. New Claims 61-70 have been added to distinguish over the cited references. Support for the new claims is found throughout the specification, and in particular, on page 5, lines 15-17, page 9, lines 1-7, page 10, lines 10-15, page 11, line 7, to page 12, line 3, and page 12, lines 9-12. No new matter has been added.

Applicant respectfully submits that the new claims place the application in condition for allowance. In particular, Applicant respectfully submits that the prior art of record does not disclose the computer readable storage medium of the type called for in Claim 1.

Specifically, Baisley, U.S. Application No. 6,502,112 ("Baisley") does not disclose creating "a normalized first document and a normalized second document having separate lines corresponding to" block elements identified in a first document and a second document coded in a markup language for performing a "line-by-line comparison between the normalized first and second documents," which are also "coded in the markup language."

Baisley is directed to a method for comparing "two such XMI-based XML documents for identical content" (Baisley, col. 3, lines 26-27). As described in Baisley, "[T]the method begins with the step of parsing each of the documents to create for each a semantic graph of the document's objects" (Baisley, col. 3, lines 27-29). The method compares the "semantic graph encoded in the documents rather than comparing textual content as in current XML comparison methods" (Baisley, col. 3, lines 10-12).

In the claimed invention, the comparison is performed between normalized documents that are also coded in the same markup language as the original documents and preserve the visual formatting of the original documents. Baisley does not teach or suggest comparing

normalized versions of the XMI-based XML documents that are also coded in XML. In fact, Baisley teaches away from comparing "textual content" in coded XML documents by comparing the semantic graphs instead of normalized XML documents. The semantic graphs are not coded in XML nor do they preserve the visual formatting of the original documents.

Likewise, Aoyama et al., U.S. Application No. 6,098,071 ("Aoyama") does not teach or suggest comparing normalized versions of documents. Aoyama "a document tree representing the structure of each structured document is produced by the above-mentioned parsing method, and the difference between the structured documents is extracted by comparison between the nodes of respective document trees" (Aoyama, col. 3, line 65, to col. 4, line 2).

There is no suggestion or disclosure in Aoyama that the comparison should be performed on normalized documents that preserve the visual formatting of the original documents. The document trees disclosed in Aoyama do not preserve the visual formatting of the original documents.

Additionally, both Baisley and Aoyama disclose comparing structures such as graphs (Baisley) or trees (Aoyama), which require traversing the structures. Nowhere in Baisley or Aoyama is a line-by-line comparison of the structures suggested. In fact, a typical line-by-line comparison as in the claimed invention can only be used on documents that are represented with sequential lines. A typical line-by-line comparison as in the claimed invention cannot be used to traverse and compare structures such as graphs (Baisley) or trees (Aoyama).

In short, Baisley and Aoyama do not disclose performing a line-by-line comparison of normalized documents that are coded in the markup language of the original documents and preserve the visual formatting of the original documents. The lack of means for providing such normalized documents and comparing them on a line-by-line basis is a strong indication that those means were not obvious at the time the invention was made.

Accordingly, in view of the foregoing amendments and remarks, it is respectfully submitted that the application is now in condition for allowance. The Examiner is invited to contact the undersigned if there are any residual issues that can be resolved through a telephone call.
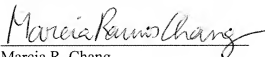
The Commissioner is hereby authorized to charge any appropriate fees to Deposit Account No. 05-1283.

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